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**Florida
Power**
CORPORATION

November 25, 1983
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Mr. James P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30303

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Bulletin 83-04, "Failure of the Undervoltage Trip
Function of Reactor Trip Breakers (GE AK-2)"
Special Report On Quality Procurement Nonconformance

Dear Mr. O'Reilly:

The purpose of this special report is to inform the Commission of a nonconformance in the manner in which Florida Power Corporation Quality Procurement procedures were implemented. Action 4e of the referenced Bulletin requests that licensees verify that procurement, testing and maintenance activities treat the Reactor Protection System breaker and undervoltage devices as safety related.

On March 21, 1983, Florida Power Corporation responded to the Nuclear Regulatory Commission's requests with regard to assuring the capability of the Reactor Trip Breakers to perform their intended safety function. The results of this verification were reported to Mr. R. C. DeYoung, Director of the Office of Inspection and Enforcement. In this response, FPC committed to complete the documentation of the qualification of our Reactor Trip Breakers prior to restart from the Cycle IV Refueling (July, 1983). FPC's response was, in part, "...Procurement procedures will be revised to assure proper documentation is obtained or proper receipt testing is performed to assure appropriate safety criteria is met. These program enhancements will be completed prior to restart from our Cycle IV Refueling."

On October 19, 1983, following a review of the documentation of spare trip breakers in storage, Florida Power Corporation identified that a spare trip breaker was installed without the required qualification documentation being completed. After subsequent reviews of various material qualification reports and inventory records, Florida Power Corporation

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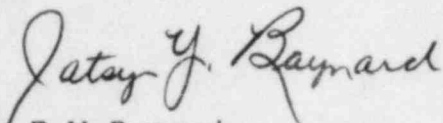
determined that proper testing had been done, that the documentation was available to assure the appropriate safety criteria was met for the installed trip breakers but that required reviews had not been accomplished in a timely manner.

This nonconformance was caused by an inadequate safety upgrade program. The program allows items classified as "Non-Safety Related" to be upgraded to "Safety Related" following appropriate testing and documentation. In general, items to be upgraded are sent to a test group for testing. The results of any testing for the purpose of upgrading non-safety related material must be evaluated and accepted by FPC Nuclear Engineering and such acceptance must be documented prior to the item being utilized in safety related applications.

On November 14, 1983, an additional nonconformance was discovered. An Agastat relay had been installed in a safety related system prior to FPC's fully documenting its acceptability for that application. Such documentation has since been completed and accepted.

FPC is reviewing and modifying our Quality Procurement program as necessary to correct this apparent deficiency. Any required changes will be completed by December 31, 1983. It should be noted that the deficiencies reported above are related to administrative approvals rather than the required acceptance testing or the acceptability of the component for its intended use.

Sincerely,



P. Y. Baynard
Assistant to the Vice President
Nuclear Operations

DPC:nsw

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